

## **PSJ2 Exh 81**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION  
4

5 -----) MDL No. 2804

6 IN RE NATIONAL PRESCRIPTION )

7 OPIATE LITIGATION )

8 ) Case No. 17-md-2804

9 This document relates to: )

10 All Cases )

11 -----) Hon Dan A. Polster

12

13 HIGHLY CONFIDENTIAL

14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

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16 The 30(b)(6) videotaped deposition of  
17 ALLERGAN by and through MARY WOODS, called for  
18 examination, taken pursuant to the Federal Rules of  
19 Civil Procedure of the United States District Courts  
20 pertaining to the taking of depositions, taken before  
21 JULIANA F. ZAJICEK, a Registered Professional Reporter  
22 and a Certified Shorthand Reporter, at Liefk Cabraser  
23 Heimann & Bernstein, 8th Floor, 250 Hudson Street, New  
24 York, New York, on January 9, 2019, at 9:10 a.m.

1     Pharmaceuticals or Actavis, Inc. employee that we  
2     would have had as backup.

3             Q.     Okay.

4             A.     Is that -- that -- that could be an  
5     employee inside of the company providing the  
6     justification.

7             Q.     Any other situations that you can see?

8                     And where is the market share -- sorry.

9             A.     Could be a -- it could be a customer that  
10    has a new product added to a contract that we would  
11    get that information from the contracts team.

12            Q.     Uh-huh.

13            A.     It could be a new product launch, we would  
14    get that information. I think in just general it says  
15    that we would contact other teams for information, so  
16    that would be something we would do internally to  
17    understand what was going on in the market.

18            Q.     Where is the language that you say  
19    "contacting other teams"?

20            A.     It just says "some of the tools used  
21    during analysis."

22            Q.     Okay. And so your impression from reading  
23    that language that's on Page 8, and it's Bates  
24    number 142, and those sub paragraphs leaves you to

1 believe that some orders could be removed from the  
2 pend list based on either written or verbal assurances  
3 without documentational backup?

4 A. I don't think verbal.

5 Q. Okay.

6 A. There would always be documentation. Your  
7 question was could it be another Actavis employee.

8 Q. Yes.

9 A. That sent an e-mail, not verbal.

10 Q. So based on the representation of another  
11 Actavis employee, pending orders could be released?

12 A. If it was the correct related information,  
13 yes, not just you are free to release this.

14 Q. Okay.

15 A. That would not suffice.

16 Q. And is that -- is -- is what you are  
17 saying listed anywhere here in particular or is it  
18 your impression based on reading this information?

19 A. It is not my impression. I know what the  
20 process was and it states, you know, some of the tools  
21 used during the analysis, which means that that's not  
22 all inclusive.

23 Q. All right.

24 A. They would make sure to do a thorough